

Ashley E. Littlefield (SBN 281027)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Tel: (415) 439-1400 / Fax: (415) 439-1500
ashley.littlefield@kirkland.com

Craig S. Primis, P.C. (admitted *pro hac vice*)
K. Winn Allen, P.C. (admitted *pro hac vice*)
Ronald K. Anguas, Jr. (admitted *pro hac vice*)
Katherine H. Epstein (admitted *pro hac vice*)
James Y. Xi (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: (202) 389-5000 / Fax: (202) 389-5200
cprimis@kirkland.com
winn.allen@kirkland.com
ronald.anguas@kirkland.com
kate.epstein@kirkland.com
james.xi@kirkland.com

*Attorneys for Defendants Meta Platforms, Inc.
and Mark Zuckerberg*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

DONALD J. TRUMP, et al.

CASE NO. 4:21-cv-09044-JSW

Plaintiffs,

V

META PLATFORMS, INC., et al.

Defendants.

**DECLARATION OF RONALD K. ANGUAS, JR.
IN SUPPORT OF DEFENDANTS' OPPOSITION
TO PLAINTIFF DONALD J. TRUMP'S
MOTION FOR PRELIMINARY INJUNCTION**

1 I, Ronald K. Anguas, Jr. declare under penalty of perjury that the following is true and correct:

2 1. I am an attorney licensed to practice law in the District of Columbia and am one of the
3 counsel for Defendants Meta Platforms, Inc. (“Meta”) and Mark Zuckerberg in this case. I submit this
4 declaration in support of Defendants’ Opposition to Plaintiff Donald J. Trump’s Motion for Preliminary
5 Injunction. I am over 18 years of age. I have personal knowledge of the facts stated in this declaration,
6 and I am competent to testify to the facts set forth below.

7 2. **Exhibit A** is a true and accurate copy of Meta’s January 6, 2021 and January 7, 2021
8 public announcement regarding the removal of Mr. Trump’s Facebook posts and suspension of Mr.
9 Trump’s account, as downloaded on January 13, 2022 from Meta’s website at
10 <https://about.fb.com/news/2021/01/responding-to-the-violence-in-washington-dc>.

11 3. **Exhibit B** is a true and accurate copy of Meta’s January 21, 2021 public announcement
12 referring Mr. Trump’s suspension to the Oversight Board, as downloaded on January 13, 2022 from
13 Meta’s website at <https://about.fb.com/news/2021/01/referring-trump-suspension-to-oversight-board>.

14 4. **Exhibit C** is a true and accurate copy of the Oversight Board’s May 5, 2021 decision
15 regarding Mr. Trump’s suspension, as downloaded on January 13, 2022 from the Oversight Board’s
16 website at <https://www.oversightboard.com/sr/decision/2021/001/pdf-english>.

17 5. **Exhibit D** is a true and accurate copy of Meta’s June 4, 2021 response to the Oversight
18 Board’s recommendation and decision to suspend Mr. Trump for two years, as downloaded on January
19 13, 2022 from Meta’s website at <https://about.fb.com/news/2021/06/facebook-response-to-oversight-board-recommendations-trump>.

20 6. **Exhibit E** is a true and accurate copy of a Washington Post article titled “A year into his
21 social media exile, Trump is working to get back online,” as downloaded on January 14, 2022 from the
22 Westlaw database.

23 24 25 26 27 28 Dated: January 14, 2022

/s/ Ronald K. Anguas, Jr.
RONALD K. ANGUAS, JR.

ATTORNEY ATTESTATION

I, Ashley E. Littlefield, am the ECF User whose ID and password are being used to file the foregoing. In compliance with Civil Local Rule 5-1(h)(1), (3), I hereby attest that concurrence in the filing of this document has been obtained from each signatory.

Dated: January 14, 2022

/s/Ashley E. Littlefield
Ashley E. Littlefield